

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Kathleen Ragan,

Plaintiff/Counter-Defendant,

v.

BP Products North America, Inc.
and BP America, Inc.,

Defendants/Counter-Plaintiffs.

Case No. 1:17-cv-09208

Honorable Marvin E. Aspen

Magistrate Judge Jeffrey T. Gilbert

DEFENDANTS'/COUNTER-PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Defendants/Counter-Plaintiffs BP Products North America Inc. and BP America Inc. (“BP”), pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, move for summary judgment against Plaintiff Kathleen Ragan. In accordance with Local Rules 7.1 and 56.1, the specific grounds for this motion are set forth in BP’s accompanying memorandum of law and statement of undisputed material facts, both filed contemporaneously with this motion. For the reasons set forth therein, BP respectfully requests that the Court grant its motion for summary judgment and dismiss Ragan’s Amended Complaint in its entirety, with prejudice, and that the Court grant BP summary judgment on its counterclaim against Ragan.

DATED: June 27, 2019

Respectfully submitted,

BP Products North America Inc. and
BP America Inc.

By: s/ Katherine Mendez
One of Their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on June 27, 2019, she caused a true and correct copy of the foregoing **DEFENDANTS’/COUNTER-PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT** to be presented to the Clerk of the Court for filing and uploading to the CM/ECF system, which will send notification of such filing to all attorneys of record in this matter.

s/ Katherine Mendez

Katherine Mendez